

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

**IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION**

This Filing Relates to:

*All Actions*

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

**PLAINTIFFS' LETTER RESPONSE  
TO META'S UNILATERAL FILING  
ON SEARCH TERMS**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Dear Judge Kang:

At the May 23 Discovery Hearing, counsel informed the court that the Parties had conferred and intended to complete their search term negotiations by May 31st and then to submit any disputes to the Court, via a joint letter brief, 5 days later and thus today, June 7. The Court agreed to that schedule. The parties thereafter set a schedule for exchanging their respective positions in advance of filing their letter brief.

Yesterday afternoon, Plaintiffs received Meta's portion of the brief and in reviewing that portion learned, for the very first time, that Meta had performed certain statistical analyses, random sampling, and document counts to compare the efficacy of the Parties' respective search term proposal. For weeks, Plaintiffs had asked Meta if any such analysis existed and, if so, to share the results of those analyses and the information necessary to understand and substantiate them. Those requests went unanswered until yesterday.

Plaintiffs promptly requested that Meta provide further information regarding its analyses, so Plaintiffs could assess the purported results. Further, and to ensure sufficient time for Plaintiffs to receive and consider this information, Plaintiffs requested that Meta agree to a temporary suspension of the briefing process, noting that the information Plaintiffs sought might well allow the parties to further narrow the disputes. Meta insisted that the briefing go forward.

While the parties proposed and the Court ordered that the parties submit their disputes regarding search terms on June 7, Plaintiffs did not and do not understand that order to preclude the parties from seeking an adjustment to the schedule to account for the new, material, and previously undisclosed information.

In light of the foregoing, Plaintiffs cannot attest that no further meet and confer would be productive. Plaintiffs believe further conferral and the exchange of information is necessary, and therefore respectfully request additional time to substantively respond to Meta's position until after such conferral.

Dated: June 7, 2024

Respectfully submitted,

By: /s/ Lexi J. Hazam  
**LEXI J. HAZAM**  
**LIEFF CABRASER HEIMANN &**  
**BERNSTEIN, LLP**  
275 BATTERY STREET, 29TH FLOOR  
SAN FRANCISCO, CA 94111-3339  
Telephone: 415-956-1000  
lhazam@lchb.com

**PREVIN WARREN**  
**MOTLEY RICE LLC**  
401 9th Street NW Suite 630  
Washington DC 20004  
Telephone: 202-386-9610  
pwarren@motleyrice.com

Co-Lead Counsel

**CHRISTOPHER A. SEEGER**  
**SEEGER WEISS, LLP**  
55 CHALLENGER ROAD, 6TH FLOOR  
RIDGEFIELD PARK, NJ 07660  
Telephone: 973-639-9100  
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel

**JENNIE LEE ANDERSON**  
**ANDRUS ANDERSON, LLP**  
155 MONTGOMERY STREET, SUITE 900  
SAN FRANCISCO, CA 94104  
Telephone: 415-986-1400  
jennie@andrusanderson.com

Liaison Counsel

**EMILY C. JEFFCOTT**  
**MORGAN & MORGAN**  
633 WEST FIFTH STREET, SUITE 2652  
LOS ANGELES, CA 90071  
Telephone: 213-787-8590  
ejeffcott@forthepeople.com

JOSEPH VANZANDT  
**BEASLEY ALLEN**  
234 COMMERCE STREET  
MONTGOMERY, LA 36103  
Telephone: 334-269-2343  
[joseph.vanzandt@beasleyallen.com](mailto:joseph.vanzandt@beasleyallen.com)

Federal/State Liaisons

MATTHEW BERGMAN  
GLENN DRAPER  
**SOCIAL MEDIA VICTIMS LAW CENTER**  
821 SECOND AVENUE, SUITE 2100  
SEATTLE, WA 98104  
Telephone: 206-741-4862  
[matt@socialmediavictims.org](mailto:matt@socialmediavictims.org)  
[glenn@socialmediavictims.org](mailto:glenn@socialmediavictims.org)

JAMES J. BILSBORROW  
**WEITZ & LUXENBERG, PC**  
700 BROADWAY  
NEW YORK, NY 10003  
Telephone: 212-558-5500  
[jbilsborrow@weitzlux.com](mailto:jbilsborrow@weitzlux.com)

JAYNE CONROY  
**SIMMONS HANLY CONROY, LLC**  
112 MADISON AVE, 7TH FLOOR  
NEW YORK, NY 10016  
Telephone: 917-882-5522  
[jconroy@simmonsfirm.com](mailto:jconroy@simmonsfirm.com)

ANDRE MURA  
**GIBBS LAW GROUP, LLP**  
1111 BROADWAY, SUITE 2100  
OAKLAND, CA 94607  
Telephone: 510-350-9717  
[amm@classlawgroup.com](mailto:amm@classlawgroup.com)

ALEXANDRA WALSH  
**WALSH LAW**  
1050 Connecticut Ave, NW, Suite 500  
Washington D.C. 20036  
Telephone: 202-780-3014  
[awalsh@alexwalshlaw.com](mailto:awalsh@alexwalshlaw.com)

MICHAEL M. WEINKOWITZ  
**LEVIN SEDRAN & BERMAN, LLP**  
510 WALNUT STREET  
SUITE 500  
PHILADELPHIA, PA 19106  
Telephone: 215-592-1500  
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN  
**RON AUSTIN LAW**  
400 MANHATTAN BLVD.  
HARVEY, LA 70058  
Telephone: 504-227-8100  
raustin@ronaustinlaw.com

PAIGE BOLDT  
**WALSH LAW**  
4 Dominion Drive, Bldg. 3, Suite 100  
San Antonio, TX 78257  
Telephone: 210-448-0500  
PBoldt@alexwalshlaw.com

THOMAS P. CARTMELL  
**WAGSTAFF & CARTMELL LLP**  
4740 Grand Avenue, Suite 300  
Kansas City, MO 64112  
Telephone: 816-701-1100  
tcartmell@wcclp.com

SARAH EMERY  
**HENDY JOHNSON VAUGHN EMERY PSC**  
600 WEST MAIN STREET, SUITE 100  
LOUISVILLE, KT 40202  
Telephone: 859-600-6725  
semery@justicestartshere.com

CARRIE GOLDBERG  
**C.A. GOLDBERG, PLLC**  
16 Court St.  
Brooklyn, NY 11241  
Telephone: 646-666-8908  
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.  
**HENDY JOHNSON VAUGHN EMERY PSC**  
600 WEST MAIN STREET, SUITE 100  
LOUISVILLE, KY 40202  
Telephone: 859-578-4444  
rjohnson@justicestartshere.com

SIN-TING MARY LIU  
**AYLSTOCK WITKIN KREIS &  
OVERHOLTZ, PLLC**  
17 EAST MAIN STREET, SUITE 200  
PENSACOLA, FL 32502  
Telephone: 510-698-9566  
mliu@awkolaw.com

JAMES MARSH  
**MARSH LAW FIRM PLLC**  
31 HUDSON YARDS, 11TH FLOOR  
NEW YORK, NY 10001-2170  
Telephone: 212-372-3030  
jamesmarsh@marshlaw.com

JOSEPH E. MELTER  
**KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
RADNOR, PA 19087  
Telephone: 610-667-7706  
jmeltzer@ktmc.com

HILLARY NAPPI  
**HACH & ROSE LLP**  
112 Madison Avenue, 10th Floor  
New York, New York 10016  
Telephone: 212-213-8311  
hnappi@hrsclaw.com

EMMIE PAULOS  
**LEVIN PAPANTONIO RAFFERTY**  
316 SOUTH BAYLEN STREET, SUITE 600  
PENSACOLA, FL 32502  
Telephone: 850-435-7107  
epaulos@levinlaw.com

RUTH THI RIZKALLA  
**THE CARLSON LAW FIRM, PC**  
1500 ROSECRANS AVE., STE. 500  
MANHATTAN BEACH, CA 90266  
Telephone: 415-308-1915  
rrizkalla@carlsonattorneys.com

ROLAND TELLIS  
DAVID FERNANDES  
**BARON & BUDD, P.C.**  
15910 Ventura Boulevard, Suite 1600  
Encino, CA 91436  
Telephone: 818-839-2333  
rtellis@baronbudd.com  
dfernandes@baronbudd.com

MELISSA YEATES  
**KESSLER TOPAZ MELTZER & CHECK LLP**  
280 KING OF PRUSSIA ROAD  
RADNOR, PA 19087  
Telephone: 610-667-7706  
myeates@ktmc.com

DIANDRA “FU” DEBROSSE ZIMMERMANN  
**DICELLO LEVITT**  
505 20th St North  
Suite 1500  
Birmingham, Alabama 35203  
Telephone: 205-855-5700  
fu@dicelloselevitt.com

Plaintiffs’ Steering Committee Membership

*Attorneys for Individual Plaintiffs*

**PHILIP J. WEISER**  
Attorney General  
State of Colorado

*/s/ Bianca E. Miyata*  
Bianca E. Miyata, CO Reg. No. 42012,  
*pro hac vice*  
Senior Assistant Attorney General  
Lauren M. Dickey, CO Reg. No. 45773  
First Assistant Attorney General  
Megan Paris Rundlet, CO Reg. No. 27474  
Senior Assistant Solicitor General  
Elizabeth Orem, CO Reg. No. 58309  
Assistant Attorney General  
Colorado Department of Law  
Ralph L. Carr Judicial Center  
Consumer Protection Section  
1300 Broadway, 7th Floor  
Denver, CO 80203  
Phone: (720) 508-6651  
bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.  
Philip J. Weiser, Attorney General*

**ROB BONTA**  
Attorney General  
State of California

*/s/ Megan O'Neill*  
Nicklas A. Akers (CA SBN 211222)  
Senior Assistant Attorney General  
Bernard Eskandari (SBN 244395)  
Supervising Deputy Attorney General  
Megan O'Neill (CA SBN 343535)  
Joshua Olszewski-Jubelirer(CA SBN 336428)  
Marissa Roy (CA SBN 318773)  
Nayha Arora (CA SBN 350467)  
Deputy Attorneys General  
California Department of Justice  
Office of the Attorney General  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
Phone: (415) 510-4400  
Megan.Oneill@doj.ca.gov

*Attorneys for Plaintiff the People of the State of California*

**RUSSELL COLEMAN**  
Attorney General  
Commonwealth of Kentucky

/s/ J. Christian Lewis  
J. Christian Lewis (KY Bar No. 87109),  
*Pro hac vice*  
Philip Heleringer (KY Bar No. 96748),  
*Pro hac vice*  
Zachary Richards (KY Bar No. 99209),  
*Pro hac vice*  
Daniel I. Keiser (KY Bar No. 100264),  
*Pro hac vice*  
Matthew Cocanougher (KY Bar No. 94292),  
*Pro hac vice*  
Assistant Attorneys General  
1024 Capital Center Drive, Suite 200  
Frankfort, KY 40601  
CHRISTIAN.LEWIS@KY.GOV  
PHILIP.HELERINGER@KY.GOV  
ZACH.RICHARDS@KY.GOV  
DANIEL.KEISER@KY.GOV  
MATTHEW.COCANOUGHER@KY.GOV  
Phone: (502) 696-5300  
Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of Kentucky*

**MATTHEW J. PLATKIN**  
Attorney General  
State of New Jersey

/s/ Kashif T. Chand  
Kashif T. Chand (NJ Bar No. 016752008),  
*Pro hac vice*  
Section Chief, Deputy Attorney General  
Thomas Huynh (NJ Bar No. 200942017),  
*Pro hac vice*  
Assistant Section Chief, Deputy Attorney General  
Verna J. Pradaxay (NJ Bar No. 335822021),  
*Pro hac vice*  
Mandy K. Wang (NJ Bar No. 373452021),  
*Pro hac vice*  
Deputy Attorneys General  
New Jersey Office of the Attorney General,

Division of Law  
124 Halsey Street, 5th Floor  
Newark, NJ 07101  
Tel: (973) 648-2052  
Kashif.Chand@law.njoag.gov  
Thomas.Huynh@law.njoag.gov  
Verna.Pradaxay@law.njoag.gov  
Mandy.Wang@law.njoag.gov

*Attorneys for Plaintiffs New Jersey Division of Consumer Affairs*